#### VIRGINIA:

## IN THE CIRCUIT COURT OF WARREN COUNTY

TAREQ D. SALAHI,	)
Plaintiff,	)
v.	) CASE No.: <u>[ [ [ [ ] 0 ] 6 ] 6 3 - 0 0</u>
MICHAELE H. SALAHI,	)
Defendant.	)
	)

#### **COMPLAINT FOR DIVORCE**

COMES Tareq D. Salahi, and files his Complaint for Divorce and says:

- 1. Plaintiff (Tareq) and Defendant (Michaele) were lawfully married on November 1, 2003, in Washington, D.C.
- 2. The Plaintiff is domiciled in and is and has been a *bona fide* resident and domiciliary of the Commonwealth of Virginia for more than six months immediately preceding the commencement of this suit.
- 3. That neither of the parties is on active duty with any branch of the Armed Forces of the United States of America, and both parties are over the age of 18 years and are of sound mind.
- 4. That no children were born of the marriage and that no children were adopted during the marriage.
- 5. That prior to the marriage the parties entered into and executed a Premarital Agreement.

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- 6. That the parties last cohabitated in Warren County, Virginia on or about September 13, 2011.
- 7. That upon information and belief, for a period of months before the date of separation, and unknown to the Plaintiff at that time, the Defendant was engaged in an adulterous relationship with one Neal Schoun, her paramour. I also understand that his rock band JOURNEY, paid for her travel, accommodations and other expenses.
- 8. That on or about September 13, 2011, Michaele failed to return home from Northern Virginia and I reported her missing or kidnapped. It was later learned through the FBI that she had been found with Schoun in Memphis and that the Defendant stated she was not returning home and had thus abandoned the marriage and the marital home.
- 9. Upon information and belief, on or about September 13, 2011, the Defendant vacated the marital residence without justification and established residence with her paramour, joining him on tour with a rock band, according to the press release of the band. Attachment A
- Upon information and belief the paramour sent to my email account from email account a email with an attachment of a penis.

  Attachment B.
- At no time whatsoever have I condoned or acquiesced to the adulterous affair of the Defendant since becoming aware of the same.
- 12. Nor did I do anything to justify or excuse the Defendant's adultery.
- 13. The Defendant's adultery was not procured for me, nor did I condone the Defendant's behavior.
- 14. Upon information and belief the paramour was a former boyfriend of Michaele.

- 15. Over the objections of me, she continually exposes our friends and acquaintances to her adulterous relationship and has flaunted the same throughout the community, the nation and indeed the world, and thus caused the me to suffer great harm, humiliation, and embarrassment.
- 16. That due to the abandonment of the marriage and adultery by Michaele, I have suffered both emotional and physical harm.
- 17. The Plaintiff believes that the conduct of the Defendant in vacating the marital residence to continue her adulterous relationship with her paramour constitutes desertion, both physical and financial.
- 18. Your Plaintiff has been greatly hurt and disturbed by the Defendant's actions on or about September 13, 2011, and on that date, decided that he wished to terminate the marriage and that the separation would be permanent. There is no hope or possibility of reconciliation.
- 19. The parties have acquired assets and incurred liabilities which require classification and distribution by the Court, pursuant to §20-107.3, of the Code of Virginia, 1950, as amended and in accordance with the Premarital Agreement.

### Your Plaintiff respectfully requests the following relief:

- A. Your Plaintiff be awarded a divorce a mensa et thoro on the grounds of adultery and abandonment to be merged into a divorce a vinculo matrimonii or in the alternative, on the grounds of separation for the statutory period.
- B. That your Plaintiff be granted exclusive use and possession of the family residence during the pendency of the suit.

- C. That both parties be enjoined from transferring, encumbering, decreasing the value of, disposing of, use, or wasting of the marital properties, pendente lite.
- D. To enter an order *pendente lite* requiring the Defendant to preserve her estate so that it may be forthcoming to meet any decree which may be made in the suit.
- E. That both parties be enjoined from threatening, harassing, harming, or abusing the other, pendente lite.
- F. That the Defendant be ordered to pay security to abide by any pendente lite decree.
- G. That this Honorable Court conduct a hearing and enter an order regarding equitable distribution pursuant to §20-107.3 of the Code of Virginia, as amended.
- H. That the Court enter an order *pendente lite* pursuant to §20-103 of the Code of Virginia, 1950, as amended.
- I. That the Court ratify and affirm the Premarital Agreement of the parties.
- J. That the Court award such further relief as it deems proper and the circumstances warrant.

RESPECTFULLY SUBMITTED,

Tareq D. Salahi

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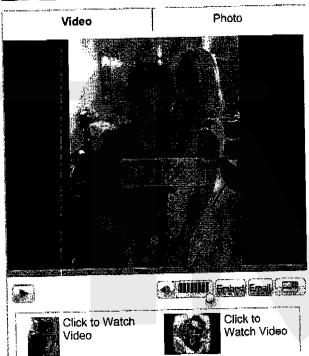
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### TMZ: Michaele Salahi Ran Off With Journey Guitarist Neal Schon

Updated: Thursday, 15 Sep 2011, 10:53 AM EDT Published : Wednesday, 14 Sep 2011, 5:56 PM EDT

FRONT ROYAL, Va. - An attorney says the husband of "Real Housewives of D.C." cast member Michaele Salahi is relieved that she's OK but devastated that she's apparently left.

Tareq Salahi's attorney, David Silek, told ABC's "Good Morning America" on Thursday that it's premature to say if the couple would get a divorce.

Sìlek's statements came amid reports that Michaele Salahi was with a member of the band Journey.

Warren County Sheriff Daniel T. McEathron said Wednesday Tareq Salahi called Tuesday afternoon to report his wife missing. In a statement, McEathron said a deputy spoke with Michaele Salahi and she assured him she had left the residence with a good friend and was where she wanted to be.

The Salahis burst onto the scene in 2009 when they crashed a White House state dinner.

But TMZ reports that Michaele has been dating Schon. Scoop Marketing, the rep for Journey, confirmed that she is currently with Schon in Memphis, where Journey is set to perform with Foreigner. She also went to his show in Nashville Tuesday night.

TMZ also confirmed Michaele has dated Schon in the past.

LINK: www.tmz.com/

Video Posted by Michaele Salahi on Her Facebook Page on October 24, 2010

(Journey at Oasis Winery with Michaele Salahi)



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#### Warren County Sheriff's Office Press Release:

The Warren County Sheriff's Office received a call from Mr. Tareq Salahi on Tuesday evening September 13, 2011 at 11:55 p.m. Mr. Salahi advised us that he last heard from his wife about 6 hours ago. He was concerned because she had contacted him from an Oregon area code and she was supposed to be back in Northern Virginia today.

Deputy Mike Glavis subsequently spoke with Mrs. Salahi by telephone a few moments later. Deputy Glavis was able to identify Mrs. Salahi by having previous conversations with her in the past. She seemed calm, was engaged in conversation, and assured the deputy that she had left the residence with a good friend and was where she wanted to be. Mrs. Salahi advised that she did not want Mr. Salahi to know where she was.

Mrs. Salahi advised Deputy Glavis that she was very sorry that the Sheriff's Office had to be involved, but she did not want to be home right now.

Deputy Glavis made contact with Mr. Salahl and advised him that he had spoken with Mrs. Salahi and told him that she was fine.

The Warren County Sheriff's Office and the FBI are currently working together in an attempt to make additional contact with Mrs. Salahi to assure her well being. We have been in 1. contact with her friends and family.

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From: Neal Schon

To: Tareq & Michaele Salahi

Date: Tue, Sep 13, 2011 9:09 pm

Attachments: photo.JPG (70K)

Sent from my iPhone



Attached mages 4 August 1997